## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

MARK STEEN, on behalf of himself and all others similarly situated,	) ELECTRONICALLY FILED
Plaintiff,	Civil Action No. 07-0147
V.	<ul><li>Judge Terrence F. McVerry</li><li>Magistrate Judge Lisa Pupo Lenihan</li></ul>
A.G. EDWARDS & SONS, INC.,	)
Defendant.	)

## RENEWED JOINT MOTION TO STAY LITIGATION PENDING COURT APPROVAL OF SETTLEMENT

Plaintiff Mark Steen ("Plaintiff") and Defendant A.G. Edwards & Sons, Inc.

("Defendant" or "A.G. Edwards"), by and through undersigned counsel, submit this Renewed

Joint Motion to Stay Litigation Pending Court Approval of Settlement, and in support thereof,

state as follows:

- 1. The above-captioned case is one of several actions pending in courts across the country against A.G. Edwards asserting wage and hour claims on behalf of Financial Consultants who worked for A.G. Edwards.
- 2. The parties in these actions have entered into a final settlement agreement.

  Therefore, on February 21, 2008, Plaintiff Steen, along with six named plaintiffs in other actions pending against A.G. Edwards, filed a consolidated class and collective action in the United States District Court for the Southern District of California, No. 08-CV-0338 ("Consolidated Action") in order to effectuate the settlement agreement in front of a single court.
- 3. Within a few days, the parties will file in the Consolidated Action the joint stipulation and settlement agreement and a joint motion for preliminary approval of the class and collective action settlement.

- 4. A preliminary approval hearing in the Consolidated Action is expected to be scheduled shortly.
- 5. The parties hereby respectfully request that this court stay the action before it pending results of the preliminary approval hearing in the Consolidated Action. The parties will notify this court promptly after receiving the ruling of the court in the Consolidated Action.
- 6. The stay requested herein is also being requested in the other actions against A.G. Edwards pending in courts across the country to facilitate the proposed settlement.

WHEREFORE, Plaintiff Mark Steen and Defendant A.G. Edwards & Sons, Inc. respectfully request that all activity of any kind in this matter be stayed until the court in the Consolidated Action issues a ruling on the proposed settlement.

## CARLSON LYNCH LTD

s/ Gary F. Lynch

R. Bruce Carlson (PA #56657) Gary F. Lynch (PA #56887) Stephanie K. Goldin (PA #202865) 231 Melville Lane Sewickley, PA 15143 Telephone: 412-749-1677

Fax: 412-749-1686

bearlson@carlsonlynch.com

RICHARDSON PATRICK WESTBROOK & BRICKMAN LLC A. Hoyt Rowell, III Daniel O. Myers 1037 Chuck Dawley Blvd., Bldg. A Mt. Pleasant, SC 29464

Counsel for Plaintiff Mark Steen

February 28, 2008

MORGAN, LEWIS & BOCKIUS LLP

s/ Christopher K. Ramsey

Christopher K. Ramsey (PA #63293) Stephanie R. Reiss (PA #88316) One Oxford Centre, 32nd Floor

Pittsburgh, PA 15219 Telephone: 412-560-3300

Fax: 412-560-7001

<u>cramsey@morganlewis.com</u> <u>sreiss@morganlewis.com</u>

Richard G. Rosenblatt (PA #59096)

1701 Market Street

Philadelphia, Pennsylvania 19103

Telephone: 215-963-5000

Fax: 215-963-5001

rrosenblatt@morganlewis.com

Counsel for Defendant A.G. Edwards & Sons, Inc.

1-PI/197581.1 2